

## REMARKS

Reexamination and reconsideration of the rejections are hereby requested.

Claims 1-5 and 32-46 are pending in this application and these claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown, et al. U.S. Patent Number 6,665,666 in view of Brown, et al. U.S. Patent Number 5,477,451. The present application is as a result of a request for continued prosecution. There have already been several office actions and responses. Applicants' views of the two Brown patents have been set forth fully in responses filed February 17, 2005 and then again on November 4, 2005. The remarks from these two responses are incorporated herein.

The nub of the disagreement with the Examiner boils down to a few issues that will be addressed herein rather than repeating all of the underlying arguments set out previously in this long prosecution. First of all, the pending claims require parsing a question to obtain an analyzed question. The Examiner takes the position that Brown '666 meets this limitation at column 11 lines 64-65. Brown here teaches that the original question can be parsed into four parts. The four parts are: the characteristic part, the initial part, the detail part, and the tail part. To the extent that this produces an "analyzed question," this analyzed question "is the concatenation of the initial part, the QA-Tokens as determined by the 'best-match' pattern, the detail and end parts." Brown goes on to say that "In essence the characteristic part of the question gets replaced by the appropriate QA-Tokens." This Brown construct is entirely different from the "analyzed question" set forth in the claims.

The Examiner's attention is directed to an example given on page 12 of the present specification. In this example, the question received is "Who did the boy see?" The question is then parsed to obtain an analyzed question.

An example analyzed question format is shown in the specification on page 12 at line 23. A question analyzer recognizes the word “who” as a question word, the word “did” as auxiliary, “the” as a determiner, “boy” as a noun, “the boy” as a noun phrase and “see” as a verb in deriving the analyzed question. This kind of parsing and analyzing is clearly not disclosed by Brown ‘666. Reconsideration is requested.

Claim 1 also includes the limitation of “transforming the one or more matched question patterns into one or more partially unspecified statements, said transforming including matching each of the matched question patterns to a set of predetermined transformations corresponding to said one or more partially unspecified statements.” In the Office Action mailed May 18, 2005 the Examiner correctly acknowledged that Brown ‘666 does not teach this quoted limitation. The Examiner has now retreated from this position in the current Office Action by asserting that Brown ‘666 at column 3 lines 48-66 does meet this limitation. Earlier in this Office Action on page 3 the Examiner cites column 3 lines 56-66 and appears to equate “predetermined transformations” with “templates.” First of all, the “predetermined transformations” are not equivalent to “templates” as used in Brown ‘666. More importantly, this limitation from claim 1 quoted above requires transforming the one or more matched question patterns into one or more partially unspecified statements in which the transforming step includes matching each of the matched question patterns to a set of predetermined transformations corresponding to the one or more partially unspecified statements. The Examiner appears to ignore the fact that Brown ‘666 nowhere teaches or suggests transforming a matched question pattern “into one or more partially unspecified statements.” The Examiner is asked to point out to the applicant where Brown ‘666 teaches or suggests transforming a question into “one or more partially unspecified statements.” It is respectfully submitted that such a teaching is lacking. Whether or not “predetermined

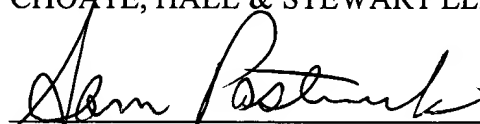
transformations” are somehow related to the “templates” in Brown ‘666, this cannot obscure the fact that Brown is utterly lacking in a teaching of “partially unspecified statements.”

It is noted that the Examiner has also changed his characterization of the teachings of Brown ‘451. In the Office Action mailed May 18, 2005 the Examiner takes the position that Brown ‘451 teaches transforming the one or more question patterns into one or more partially unspecified statements. The Examiner has now dropped this supposed Brown ‘451 teaching and relies on Brown merely for a supposed teaching that partially unspecified statements correspond to an answer to a query.

It is submitted that the Examiner’s shifting characterization of the teachings of the two references relied upon has needlessly drawn out this prosecution to applicants’ prejudice. It is noted that the claims are unchanged from the May 18, 2005 Office Action to the current December 14, 2005 Office Action, yet the Examiner has changed his characterization of the references.

It is submitted that since the references do not meet at least two of the limitations of the claims, the claims are in condition for allowance and early favorable action is requested so as to avoid the time and expense of an appeal to the Board of Patent Appeals and Interferences.

Respectfully submitted,  
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Date: June 13, 2006